

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

In re:

JOANN INC., *et al.*,<sup>1</sup>

Debtors.

## Chapter 11

Case No. 25-10068 (CTG)

(Jointly Administered)

**Re: Docket No. 1077**

**CERTIFICATION OF COUNSEL REGARDING NINETEENTH NOTICE OF  
ASSUMPTION AND ASSIGNMENT OF CERTAIN EXECUTORY  
CONTRACTS AND/OR UNEXPIRED LEASES RELATING TO  
BCS HOPPER, LLC AND LMC, LP**

The undersigned counsel to JOANN Inc. and certain of its affiliates, the debtors and debtors in possession in the above-captioned cases (collectively, the “Debtors”), hereby certifies as follows:

1. On June 5, 2025, the Debtors filed the *Nineteenth Notice of Assumption and Assignment of Certain Executory Contracts and/or Unexpired Leases* [Docket No. 1077] (the “Assumption Notice”) regarding the assumption and assignment of certain unexpired leases set forth in the Assumption Notice. Attached to the Assumption Notice was a proposed form of order (the “Assumption Order”) authorizing the assumption and assignment of certain leases.

2. The deadline to object to the Assumption Notice was June 19, 2025 (the “Objection Deadline”).

<sup>1</sup> The Debtors in these chapter 11 cases, along with the last four digits of each Debtor's federal tax identification number, are: JOANN Inc. (5540); Needle Holdings LLC (3814); Jo-Ann Stores, LLC (629); Creative Tech Solutions LLC (6734); Creativebug, LLC (3208); WeaveUp, Inc. (5633); JAS Aviation, LLC (9570); joann.com, LLC (1594); JOANN Ditto Holdings Inc. (9652); Dittopatterns LLC (0452); JOANN Holdings 1, LLC (9030); JOANN Holdings 2, LLC (6408); and Jo-Ann Stores Support Center, Inc. (5027). The Debtors' mailing address is 5555 Darrow Road, Hudson, Ohio 44236.

3. The Debtors did not receive any formal objections or informal comments from BCS Hopper, LLC (“BCS Hopper”) or LMC, LP (“LMC”), which were each included in the Assumption Notice.

4. The Debtors did receive informal comments from B33 Bandera Pointe II LLC (“Bandera”), the only other landlord included in the Assumption Notice. The Debtors have resolved the informal comments received from Bandera and have submitted a revised form of order with respect to the Bandera lease under separate certification of counsel. *See* Docket No. 1293. As such, the Debtors have removed the Bandera lease from the Assumption Order.

5. Attached hereto as **Exhibit A** is a revised proposed order (the “Revised Assumption Order”) assigning the BCS Hopper and LMC leases listed on the Assumption Notice to Michaels Stores, Inc. A redline comparing the Revised Assumption Order to the Assumption Order is attached hereto as **Exhibit B**.

6. Accordingly, the Debtors request entry of the Revised Assumption Order attached hereto as **Exhibit A** at the Court’s earliest convenience.

*[Remainder of page intentionally left blank.]*

Dated: June 26, 2025  
Wilmington, Delaware

*/s/ Jack M. Dougherty*

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**COLE SCHOTZ P.C.**

Patrick J. Reilley (No. 4451)  
Stacy L. Newman (No. 5044)  
Michael E. Fitzpatrick (No. 6797)  
Jack M. Dougherty (No. 6784)  
500 Delaware Avenue, Suite 600  
Wilmington, Delaware 19801  
Telephone: (302) 652-3131  
Facsimile: (302) 652-3117  
Email: preilley@coleschotz.com  
snewman@coleschotz.com  
mfitzpatrick@coleschotz.com  
jdougherty@coleschotz.com

*Co-Counsel to the Debtors  
and Debtors in Possession*

**KIRKLAND & ELLIS LLP**

**KIRKLAND & ELLIS INTERNATIONAL LLP**

Joshua A. Sussberg, P.C. (admitted *pro hac vice*)  
Aparna Yenamandra, P.C. (admitted *pro hac vice*)  
601 Lexington Avenue  
New York, New York 10022  
Telephone: (212) 446-4800  
Facsimile: (212) 446-4900  
Email: joshua.sussberg@kirkland.com  
aparna.yenamandra@kirkland.com

- and -

Anup Sathy, P.C. (admitted *pro hac vice*)  
Jeffrey Michalik (admitted *pro hac vice*)  
Lindsey Blumenthal (admitted *pro hac vice*)  
333 West Wolf Point Plaza  
Chicago, Illinois 60654  
Telephone: (312) 862-2000  
Facsimile: (312) 862-2200  
Email: anup.sathy@kirkland.com  
jeff.michalik@kirkland.com  
lindsey.blumenthal@kirkland.com

*Co-Counsel to the Debtors  
and Debtors in Possession*